
EXHIBIT 4



**Service of Process
Transmittal**

06/09/2017

CT Log Number 531377774

TO: Mary Britton, Attorney
Danaher Corporation
2200 Pennsylvania Ave., NW, Ste. 800W
Washington, DC 20037-1731

RE: Process Served in Virginia

FOR: ChemTreat, Inc. (Domestic State: VA)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION:	RE: Terry Windsor // To: ChemTreat, Inc.
DOCUMENT(S) SERVED:	Letter, Attachment(s)
COURT/AGENCY:	None Specified Case # None Specified
NATURE OF ACTION:	Letter of Intent - Letter indicating that Terry Windsor for personal injuries resulting from an explosion at the Valley Proteins facility in Accomac, Virginia on December 24, 2015
ON WHOM PROCESS WAS SERVED:	C T Corporation System, Glen Allen, VA
DATE AND HOUR OF SERVICE:	By Certified Mail on 06/09/2017 postmarked on 06/06/2017
JURISDICTION SERVED :	Virginia
APPEARANCE OR ANSWER DUE:	None Specified
ATTORNEY(S) / SENDER(S):	Ashley T. Davis ALLEN & ALLEN PO Box 6855 Richmond, VA 23230 (804) 257-7539
ACTION ITEMS:	SOP Papers with Transmittal, via UPS Next Day Air , 1Z0399EX0118037527 Image SOP Email Notification, Mary Britton mary.britton@danaher.com Email Notification, Anthony Yoo anthonyy@chemtreat.com Email Notification, Ephraim Starr estarr@hach.com
SIGNED:	C T Corporation System
ADDRESS:	4701 Cox Road Suite 285 Glen Allen, VA 23060
TELEPHONE:	804-217-7255

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ALLEN & ALLEN**
Attorneys for Injured Persons since 1910

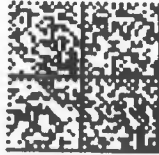
Post Office Box 6855
Richmond, VA 23230

**RETURN RECEIPT
REQUESTED**

CERTIFIED MAIL®



7015 1730 0001 3472 8841



U.S. POSTAGE >> PITNEY BOWES



ZIP 23230 \$006.77⁰
02 1W
0001401309 JUN 06 2017

ChemTreat, Inc.
c/o Registered Agent: CT Corporation System
4701 Cox Road, Ste. 285
Glen Allen, VA 23060-0000

23060\$6808 R016



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Attorneys for Injured Persons since 1910

June 5, 2017

Richmond Office
Telephone: (804) 257-7539
Facsimile: (804) 257-7589
File No. 313593

ChemTreat, Inc.
5640 Cox Road
Glen Allen, Virginia 23060

ChemTreat, Inc.
c/o Registered Agent: CT Corporation System
4701 Cox Road, Ste. 285
Glen Allen, VA 23060-0000

Dear Sir/Madam:

My law firm represents Terry Windsor for personal injuries resulting from an explosion at the Valley Proteins facility in Accomac, Virginia on December 24, 2015 (the "Incident"). On that date, the High Pressure Condensate Receiver in the boiler room at the facility failed, causing catastrophic injuries to our client and significant property damage to the plant.

It is our understanding that ChemTreat, Inc. provided services in connection with the High Pressure Condensate Receiver and other pressure vessels and equipment at the facility, and that ChemTreat, Inc. also provided training to Valley Proteins employees in connection with such equipment.

This letter is to formally demand the preservation of certain evidence related to the High Pressure Condensate Receiver, the Valley Proteins facility in Accomac, Virginia, and the Incident.

If you fail to properly secure and preserve these important pieces of evidence, we reserve the right to claim that you have destroyed and/or spoliated the evidence in a manner that is harmful to our client's claim. Furthermore, if you fail to preserve and maintain this evidence, we reserve the right to seek any sanctions available under the law.

The destruction, alteration, or loss of any of the below constitutes a spoliation of evidence. **We specifically request that the following evidence be maintained and preserved and not be destroyed, modified, altered, repaired, or changed in any manner:**

Richmond Office
1809 Staples Mill Road
Richmond, VA 23230
804.353.1200
800.768.2222
804.257.7599 fax

Petersburg Office
106 South Market Street
Petersburg, VA 23803
804.733.8753
800.777.8753
804.733.8767 fax

Chesterfield Office
6123 Harbourside Centre
Loop
Midlothian, VA 23112
804.745.1200
800.777.8993
804.745.8997 fax

Fredericksburg Office
3504 Plank Road
Fredericksburg, VA 22407
540.786.4100
800.275.8882
540.786.9585 fax

Mechanicsville Office
7255 Mechanicsville
Turnpike
Mechanicsville, VA 23111
804.746.4900
800.298.7577
804.746.2315 fax

Stafford Office
50 Dunn Drive, Suite 105
Stafford, VA 22556
540.657.9222
866.388.6410
540.657.9522 fax

Charlottesville Office
2100 Rio Hill Center
Charlottesville, VA 22901
434.295.4961
866.412.9991
434-284-4299 fax

Short Pump Office
11577 West Broad Street
Henrico, VA 23233
804.836.1170
866.727.1276
804.836.1189 fax
www.allenandallen.com

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1. All contracts, purchase orders and invoices pertaining to the **Valley Proteins, Inc. facility** located at **22520 Lankford Highway** in Accomac, Virginia.
2. Any emails, electronic messages, letters, memos, or other documents concerning the **High Pressure Condensate Receiver** at the Valley Proteins facility in Accomac, Virginia (the **HPCR**).
3. Any test reports or results, inspection reports, sampling records, or similar documentation concerning the **testing, inspection, and sampling** of the HPCR.
 - This request specifically includes **all Boiler Service Reports** or similar documents relating to the HPCR (we have enclosed an example with this letter).
 - This request also includes all *internal* correspondence, documents and electronic communications about the HPCR at ChemTreat, Inc.
4. All **guidance documents**, worksheets, manuals, **industry standards**, textbooks, protocols, checklists or similar materials that you (and your agents and employees) used, consulted, referred to, or relied upon in connection with the HPCR at the Valley Proteins facility located at 22520 Lankford Highway in Accomac, Virginia.
5. All correspondence, documents and electronic communications concerning **training** that you provided to employees at the Valley Proteins, Inc. facility located at 22520 Lankford Highway before December 25, 2015.
 - This request specifically includes training materials and handouts, training manuals, class rosters, and sign-in/attendance sheets.
6. All correspondence, documents and electronic communications concerning the **Incident** that is the subject of this litigation.
7. All correspondence, documents and electronic communications to or from **Valley Proteins, Inc.** concerning the HPCR or this Incident.
8. All correspondence, documents and electronic communications to or from **Perdue Farms** concerning the HPCR or this Incident.
9. All correspondence, documents and electronic communications to or from **Mid-South Steam Boiler and Engineering Co., Inc.** concerning the HPCR or this Incident.

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10. All correspondence, documents and electronic communications to or from **Hartford Steam Boiler Inspection and Insurance Company** concerning the HPCR or this Incident.
11. All correspondence, documents and electronic communications to or from **Tate Engineering Systems, Inc.** concerning the HPCR or this Incident.
12. All correspondence, documents and electronic communication to or from any **government agency or organization** concerning the HPCR or this Incident, including the Virginia Department of Labor and Industry (DOLI), the Boiler and Pressure Vessel Safety Division, and OSHA/VOSHA.
13. Photographs, video, computer generated media, or other recordings of the HPCR involved in the Incident.
14. All correspondence, documents and electronic communications concerning our client, Terry Windsor.
15. **Evidence Created Subsequent to This Letter:** With regard to electronic data created subsequent to the date of delivery of this letter, relevant evidence is not be destroyed and you are to take whatever steps are appropriate to avoid destruction of evidence.

It is our understanding that the HPCR was originally purchased and installed by **Perdue Farms** at **22520 Lankford Highway** in Accomac, Virginia, and that Perdue Farms subsequently sold a portion of its processing plant (including the HPCR), to Valley Proteins, Inc. If you had a service contract in connection with the HPCR before Perdue Farms sold a portion of its business to Valley Proteins, you should also maintain and preserve any and all correspondence, documents and electronic communications – as outlined above – relating to Perdue Farms.

In order to assure that your obligation to preserve documents and things is met, please immediately forward a copy of this letter to all persons and entities with custodial responsibility for the items referred to in this letter.


If you have any questions, please do not hesitate to call.

Sincerely,



Ashley T. Davis

ATD/dms

	Boiler Service Report
	ChemTreat, Inc. 4461 Cox Road Glen Allen, VA 23060 1-804-935-2000

Company: Valley Proteins Location: Accomac Protein Accomac, VA Engineer: Reed Parks, Alan Pugh, Operations	Date: 01-8-2014 Tel. No.: Copies to: Matt Stillwagon Jane Keller Neil Gagnon
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Analysis	Raw-Well	Makeup Softener	DA/HPCR	Bollers					Steam	Dryer	Evapo-rator	Recommen-ded Limits
				1	2	3	4					
pH ₂₅	7.9	7.9	6.8-7.5							N	8.2	6.5-8.5
'P' Alkalinity				400	300	D	450					400-700
'M' Alkalinity	140	140	-/-	500	400	O	600					
'OH' Alkalinity				300	200	W	300					
Hardness, Tot.	116	0	0/0							A	0	0
Phosphate				36	42		82					30-60
				20	15		20					30-60
Fe	-	61	-/22							L		
Cond.-Neut.				2150	1740		2300					2000-2600
Cond.-Un-Neut.	424	424	480/170	3200	2515		3570				10	
Controller - Cond.				3800	4200		3800					SP=3700
Softener Makeup Meter		77801000										
Avg. Makeup		- GPD										

Products		Daily Avg.	Dosage	Dosage Per Tank												Drum Meas.	Operation		
Name	Today's Inventory			Pres	Rec	Pres	Rec	Pres	Rec	Pres	Rec	Pres	Rec	Pres	Rec		Steam Pressure:		
B120	1+1/4		Lbs	5											FW Pressure:	120 psi			
BL4356	138		Gal	1											FW	10psi			
B141	2/3		Lbs			3		.5		.5		.5			Temperature:	310F/105psi			
BL1544	78		Qts			1		.5		.5		.5			% Cond. Return:	64%			
																Fuel Type:	Poultry + #2		
																Fuel Oil Treatment			
																Product	Inventory	Feed Rate	
Continuous Blowdown Setting																			
Manual Blowdown				Number Per Day:		3													
				Time in Seconds:		15													

**Boiler Service Report**

ChemTreat, Inc.
4461 Cox Road
Glen Allen, VA 23060
1-804-935-2000

Comments

1. Boiler#1- Good control of system cycles and chemical treatment residuals. Please maintain current dosage levels. Minor calibration to blowdown controller made during visit.
2. Boiler#2- Low conductivity and cycles in boiler. Controller probe calibration is off from raw conductivity, calibrated controller during visit. Levels should rise as blowdown rate is reduced.
3. Boiler#4- Good control of system cycles and chemical treatment residuals. New valves are onsite to replace leaking blowdown valves on boilers 2,4.
4. No issues noted with feedwater or condensate quality. Good job with testing and control by plant operations staff.

Technical Representative: Adam Hildebrant
Address: Milton, DE

Phone: 443-614-2080